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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: VOLKSWAGEN “CLEAN)	
DIESEL” MARKETING, SALES)	MDL No. 2672 CRB (JSC)
PRACTICES, AND PRODUCTS)	
LIABILITY LITIGATION)	STIPULATION AND ORDER EXTENDING
)	DEADLINE FOR DEFENDANTS’ ANSWERS

This Document Relates to:)	
)	The Honorable Charles R. Breyer
<i>BRS v. Volkswagen AG, et al.</i> , Case No.)	
16-cv-3435 (“Bondholders Securities)	
Action”))	

1 This Stipulation is entered into between Defendants Volkswagen AG, Volkswagen
 2 Group of America, Inc. and Volkswagen Group of America Finance, LLC (the “Corporate
 3 Defendants”), Defendants Michael Horn and Martin Winterkorn (together with the Corporate
 4 Defendants, “Defendants”), and Plaintiff Puerto Rico Government Employees and Judiciary
 5 Retirement Systems Administration (“Plaintiff”) (collectively with Defendants, the “Parties”).

6 WHEREAS, on April 2, 2018, Plaintiff filed its Second Amended Class Action
 7 Complaint for Violations of the Federal Securities Laws Regarding Volkswagen Bonds (“Second
 8 Amended Complaint”) (ECF. No. 4956);

9 WHEREAS, on May 2, 2018, Corporate Defendants and Martin Winterkorn filed a
 10 Motion to Dismiss the Second Amended Complaint (ECF. No. 5021);

11 WHEREAS, on May 2, 2018, Defendant Michael Horn filed a Motion to Dismiss the
 12 Second Amended Complaint (ECF. No. 5019);

13 WHEREAS, on September 7, 2018, the Court denied Defendants’ Motions to dismiss
 14 and ordered that Defendants answer the Second Amended Complaint by September 28, 2018 (ECF.
 15 No. 5339);

16 WHEREAS, Defendants have not previously requested an extension of their time to
 17 answer the Second Amended Complaint

18 WHEREAS, Plaintiffs do not oppose a 60-day extension of Defendants’ time to answer
 19 the Second Amended Complaint;

20 IT IS THEREFORE STIPULATED AND AGREED by the Parties, through their
 21 respective counsel of record, that, subject to the Court’s approval, Defendants’ answers to the Second
 22 Amended Complaint will be filed no later than November 27, 2018.

23 IT IS SO STIPULATED.

24 Dated: September 21, 2018

25
 26 Respectfully submitted,

27 /s/ Robert J. Giuffra, Jr.
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*Attorneys for Plaintiff Puerto Rico Government
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Administration*

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: September 21, 2018



CHARLES R. BREYER

United States District Judge